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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all other  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**SECOND DECLARATION OF MARK  
MAO IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION  
(DKT. 609)**

Judge: Hon. Yvonne Gonzalez Rogers  
September 20, 2022  
Time: 2:00 p.m.  
Location: Courtroom 1 – 4th Floor

1 I, Mark Mao, declare as follows:

2 1. I am a member of the Bar of California and a partner at the law firm of Boies  
3 Schiller Flexner LLP, counsel to Plaintiffs in this matter. I make this declaration in support of  
4 Plaintiffs' motion for class certification (Dkt. 609). I make this declaration based upon matters  
5 within my own personal knowledge. If called as a witness, I could and would competently testify  
6 to the matters set forth herein.

7 2. Attached hereto as **Exhibit 92** is a true and correct copy of the transcript from the  
8 June 30, 2022 deposition of Google employee Sabine Borsay, taken by Plaintiffs. For ease of  
9 reference, I have numbered the exhibits attached hereto so as to continue where the exhibit  
10 numbering left off in my prior Declaration in Support of Plaintiffs' Motion for Class Certification  
11 (Dkt. 609-17), filed on June 21, 2022. The final exhibit to that Declaration was Exhibit 91.

12 3. Attached hereto as **Exhibit 93** is a true and correct copy of the transcript from the  
13 August 22, 2022 deposition of Google expert Georgios Zervas, taken by Plaintiffs.

14 4. Attached hereto as **Exhibit 94** is a true and correct copy of email communications  
15 between my colleagues and counsel for Google between May 20, 2022, and June 3, 2022.

16 5. Attached hereto as **Exhibit 95** is a true and correct copy of the transcript from the  
17 August 16, 2022 deposition of Google expert On Amir, taken by Plaintiffs.

18 6. Attached hereto as **Exhibit 96** is a true and correct copy of the transcript from the  
19 July 15, 2022 deposition of Plaintiffs' expert Mark Keegan, taken by Google.

20 7. Attached hereto as **Exhibit 97** is a true and correct copy of a document that Google  
21 produced, labeled GOOG-BRWN-00856578, which Google produced on July 6, 2022, in response  
22 to the Court's privilege re-review order (Dkt. 605).

23 8. Attached hereto as **Exhibit 98** is a true and correct copy of the transcript from the  
24 August 19, 2022 deposition of Google expert Konstantinos Psounis, taken by Plaintiffs.

25  
26 I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th  
27 day of August 2022 in San Francisco, California.  
28

By: /s/ Mark C. Mao

Mark C. Mao

BOIES SCHILLER FLEXNER LLP